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| 1 | Adam P. Segal, Esq., Nevada Bar No. 6120 | | | | |
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| 2 | Bryce C. Loveland, Esq., Nevada Bar No. 10 BROWNSTEIN HYATT FARBER SCHRE | | | | |
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| 7 | Attorneys for Plaintiff Board of Trustees of the Southern Nevada Joint Management and Culinary and | | | | |
| 8 | Bartenders Training Fund dba Culinary Academy of | | | | |
| 9 | Las Vegas | | | | |
| 10 | UNITED STATES DISTRICT COURT | | | | |
| 11 | DISTRICT OF NEVADA | | | | |
| 12 | | | | | |
| 13 | Board of Trustees of the Southern Nevada | CASE NO.: 2:18-cv- | | | |
| 14 | Joint Management and Culinary and Bartenders Training Fund dba Culinary | | | | |

D.: 2:18-cv-00036-JCM-CWH

Academy of Las Vegas, Plaintiff, Christopher Fava, an individual; Jaime Monardes, an individual; Eclipse Theater LLC, a Nevada limited liability company; Eclipse Theater Las Vegas, Limited Partnership, a Delaware Limited Partnership; 21 Greens Inc, a Nevada corporation; Federal Insurance Company, an Indiana corporation; HKM Productions Inc., a Nevada corporation,

STIPULATION AND ORDER TO EXTEND **DEADLINES TO MOTION TO DISMISS**

[FIRST REQUEST]

Plaintiff, the Board of Trustees of the Southern Nevada Joint Management and Culinary and Bartenders Training Fund dba Culinary Academy of Las Vegas ("CALV") by and through their undersigned counsel of record, and Defendant, Federal Insurance Company ("Federal") by and through its undersigned counsel of record, stipulate and request an order extending the Trust's response deadline to Federal's Motion to Dismiss [ECF No. 29] filed March 7, 2018, by

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Defendants.

| 1 | fourteen days from March 21, 2018, to April 4, 2018. The parties also stipulate and request that | | |
|----|--|---|--|
| 2 | Federal's reply in support of its Motion to Dismiss be due on April 18, 2018. | | |
| 3 | The pending extension request will have no prejudice and is not sought for an improper | | |
| 4 | purpose or delay. | | |
| 5 | | | |
| 6 | BROWNSTEIN HYATT FARBER SCHRECK, LLP | PYATT SILVESTRI | |
| 7 | /s/ Bryce C. Loveland | /s/ James Silvestri | |
| 8 | Adam P. Segal. Esq. | James P. C. Silvestri, Esq. | |
| 0 | Nevada Bar No. 6120 | Nevada Bar No. 3603 | |
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| 12 | Telephone: 702.382.2101 Facsimile: 702.382.8135 | Email: jsilvestri@pyattsilvestri.com | |
| 12 | Email: asegal@bhfs.com | Angelo Savino, Esq. (Pro Hac Vice) | |
| 13 | bcloveland@bhfs.com | COZEN O' CONNOR | |
| | <u>beloveland & biris.com</u> | New York Bar No. 17880066 | |
| 14 | | 45 Broadway, Suite 1600 | |
| 15 | Attorneys for Plaintiff | New York, NY 10006 | |
| 15 | | Telephone: (212) 908-1248 | |
| 16 | | | |
| 17 | | Attorneys for Federal Insurance Company | |
| 18 | | Anomeys for Pederal Insurance Company | |
| 10 | | | |
| 19 | Dated: March 13, 2018. | Dated: March 13, 2018. | |
| 20 | | O R D E R | |
| 21 | | | |
| 22 | IT IS SO ORDERED that CALV'S response to Federal's Motion to Dismiss is due | | |
| 23 | April 4, 2018, and Federal's reply in support to the Motion to Dismiss is due April 11, 2018. | | |
| 24 | | Dellus C. Mahan | |
| | UNITED STATES DISTRICT JUDGE | | |
| 25 | D. 4 (5) | March 15, 2018 | |
| 26 | DAT | ED: | |
| 27 | CASE NO. 2:18-cv-00036-JCM-CWH | | |
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| 1 2 | <u>CERTIFICATE OF SERVICE</u> | | |
|----------|---|--|--|
| 3 | Pursuant to Federal Rule of Civil Procedure 5(b), I certify that I am an employee o | | |
| 4 | Brownstein Hyatt Farber Schreck, LLP and that on March 13, 2018, I served a true copy of the | | |
| 5 | foregoing STIPULATION AND ORDER TO EXTEND DEADLINES TO MOTION TO | | |
| 6 | DISMISS via: | | |
| 7 8 | □ a. CM/ECF System | | |
| 9 10 | Mark J. Connot, Esq. FOX ROTHSCHILD LLP | John C. Courtney, Esq. Jose E. Valenzuela III, Esq. | |
| 11 | 1980 Festival Plaza Drive, Suite 700 Las Vegas, NV 89135 | LBC Law Group 3215 W Charleston Blvd., Suite 120 | |
| 12 | Telephone: (702) 262-6899 Facsimile: (702) 597-5503 | Las Vegas, NV 89102 Telephone: (702) 608-3030 | |
| 13 | Email: mconnot@foxrothschild.com | Facsimile: (702) 463-4443 Email: Info@LBCLawGroup.com | |
| 14 15 | Attorney for Defendants Eclipse Theater, LLC, Eclipse Theater Las Vegas, Limited Partnership, and 21 Greens, Inc. | Attorneys for HKM Productions | |
| 16 | | | |
| 17 | I declare under penalty of perjury that | | |
| 18 | /s/ Ebony Davis An Employee of Brownstein Hyatt Farber Schreck, LLP | | |
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